## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	) )
v.	) Criminal No. 1:11-cr-00186-S
JOSEPH CARAMADRE, and	)
RAYMOUR RADHAKRISHNAN	)

## DEFENDANT JOSEPH CARAMADRE'S MOTION FOR 14-DAY PERIOD IN WHICH TO FILE REPLY MEMORANDUM

Now comes the defendant, through counsel, and hereby moves this Honorable Court for a 14-day period, through March 28, 2013, in which to file a reply to the "Government's Opposition to Defendant Caramadre's Motion to Withdraw his Guilty Plea".

A supporting memorandum of law accompanies this motion.

Respectfully submitted, Joseph Caramadre, By his attorneys,

/s/ Randy Olen

Randy Olen, Esq. 478A Broadway Providence, RI 02909 (401) 274-1400 (401) 274-2480 (fax)

/s/ Robert D. Watt, Jr.

Robert D. Watt, Jr., Esq. 84 Ship Street Providence, RI 02903 (401) 273-0484 (401) 453-4906 (fax)

## **CERTIFICATION**

I hereby certify that on this 14<sup>th</sup> day of March 4, 2013, I caused to be delivered, via first class mail, the within *Motion* to:

John P. McAdams, Esq. U.S. Attorney's Office 50 Kennedy Plaza, 8<sup>th</sup> Floor Providence, RI 02903

Olin W. Thompson, Esq. Federal Defender's Officer 10 Weybosset Street, Suite 300 Providence, RI 02903 Lee Vilker, Esq. U.S. Attorney's Office 50 Kennedy Plaza, 8<sup>th</sup> Floor Providence, RI 02903